

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of:)
)
Revision of the Commission's Rules to Ensure) CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency Calling)
Systems)

To: The Commission

**QUARTERLY REPORT OF EAGLE TELEPHONE SYSTEM, INC.
REGARDING TTY ACCESS TO DIGITAL WIRELESS SYSTEMS**

Eagle Telephone System, Inc. ("Eagle"), consistent with the Commission's decision in the TTY *Fourth Report and Order* encouraging the filing of aggregate TTY-digital deployment status reports by carriers,¹ hereby associates itself with the quarterly status report of Farmers Mutual Telephone Company ("Farmers") filed on January 14, 2003 (attached hereto as Exhibit A).

As background, Eagle is a small, rural wireless carrier licensed to operate a commercial wireless network on various disaggregated frequencies in certain portions of Baker County, Oregon, Union County, Oregon and Wallowa County, Oregon pursuant to three broadband Personal Communications Services ("PCS") licenses.² Eagle acquired these licenses on December 13, 2000, June 15, 2001, and May 24, 2002, respectively, and launched commercial service on September 27, 2001. Eagle is part of a consortium of small, rural PCS licensees in

¹ *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Fourth Report and Order, 15 FCC Rcd 25216 (2000).

² See Call Signs WPQT670, WPQS784 and WPUK735.

Idaho and Oregon conducting business under the “Snake River PCS” brand name. As a member of the consortium, Eagle has agreed to purchase all of its wireless switching services and handsets directly from Farmers, another member of the consortium. As such, Eagle will be subject to and will receive the same technology upgrades as Farmers to provide TTY-digital services.

On June 28, 2002, the FCC extended Farmer’s and Eagle’s TTY-digital compliance deadlines until December 31, 2002.³ This extension was needed in order allow Farmers to modify (*i.e.*, “split”) its switch to accommodate the TTY-compatible MTX10 software release.⁴ As Farmers reported in its October 15, 2002 quarterly report, however, vendor-related delays associated with this switch modification necessitated that Farmers seek a limited extension of the FCC-adjusted deadline. Accordingly, on December 6, 2002, Farmers, and on December 23, 2002, Eagle, filed requests with the Commission requesting an extension of their respective TTY compliance deadlines. As indicated in these requests, Farmer’s vendor anticipates completing the switch modification by January 31, 2003, and expects to complete installation and testing of the software upgrade and to be TTY compliant by May 15, 2003.

Eagle is committed to compliance with the Commission’s TTY-digital deployment requirements. As set forth above, however, Eagle is obligated to purchase all of its switching services and handsets from Farmers, and is therefore entirely dependent on Farmers’ efforts to upgrade its capabilities and Farmers’ ability to obtain TTY-digital compatible handsets from vendors. In this regard, Eagle has no reason to believe that Farmers has been anything less than

³ *In re Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order, CC Docket No. 94-102, DA 02-1540 (rel. June 28, 2002).

⁴ Farmers’ switch is a DMS100W wireline/wireless hybrid. Nortel no longer supports such hybrid switches with software upgrades. Farmers must therefore “split” the switch in order to upgrade the separated wireless portion to MTX10 in order to achieve digital TTY compatibility.

fully diligent. Accordingly, Eagle respectfully requests that the Commission associate Eagle with Farmers' January 14, 2003 quarterly TTY deployment status report.

January 15, 2003

EXHIBIT A

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with Enhanced)	
E911 Emergency Calling Systems)	
)	

To: The Commission

**Quarterly Report of Farmers Mutual Telephone Company
Regarding TTY Access to Digital Wireless Systems**

Farmers Mutual Telephone Company ("Farmers") hereby reports on its implementation of text telephone ("TTY") access to digital wireless systems, in compliance with the Federal Communications Commission's ("FCC" or "Commission") *Waiver Grant Order* in the above-captioned proceeding.¹

In its April 15, 2002 report, Farmers informed the Commission that in order for Farmers' switch to be digital TTY-compliant, it must be upgraded to Nortel MTX10 software. Further, In order to accept such software, Farmers has to have Nortel modify ("split") its switch.² In its last report filed on October 15, 2002, Farmers informed the Commission that Nortel was behind schedule in modifying the switch. Farmers reported that Nortel had informed Farmers that it expected to finish the switch modification process by the second week of January 2003. In addition, Farmers noted in that report that it would be unable to meet the FCC-adjusted

¹ *In re Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order, CC Docket No. 94-102, DA 02-1540 (June 28, 2002) ("*Waiver Grant Order*").

² Farmers' switch is a DMS 100W wireline/wireless hybrid. Nortel no longer supports such wireline/wireless hybrid switches with software upgrades. Farmers must split the switch in two in order to upgrade to digital TTY-compatible MTX10 in the separate wireless portion of the switch.

implementation date of December 31, 2002,³ and would therefore be filing a request for limited waiver of that deadline.

In its December 6, 2002 request for waiver, Farmers informed the Commission that Nortel had notified Farmers that its expected completion date for the switch modification was further delayed until January 31, 2003. Since Farmers' filing of its request for waiver on December 6, 2002, Nortel's schedule remains on track and assuming that Nortel can stay on this schedule, Farmers expects that Nortel can finish the switch modification and install the TTY upgrade software in time for Farmers to test the upgrade and be TTY compliant by May 15, 2003.⁴

January 14, 2003

³ See *Waiver Grant Order*, Appendix A at 13.

⁴ See Farmers' December 6, 2002 request for waiver for further details regarding the time-consuming and complex switch modification and upgrade process.